CLAYTON J. THOMAS

IN THE

and

CIRCUIT COURT

GERTRUDE V. THOMAS

FOR

Plaintiffs

FREDERICK COUNTY,

VS.

MARYLAND

LAWSON DOWNEY, his successors,*
heirs, Personal Representatives
and/or assigns
(Address unknown)

CIVIL NO. 3850C

and

CHING-TAI B. KAO

and

KUNG Y. TANG KAO

and

ANY AND ALL PERSONS CLAIMING ANY INTEREST IN CERTAIN PAR-CELS OF REAL PROPERTY SITUATE IN FREDERICK COUNTY, MARYLAND, * AND KNOWN AND DESCRIBED AS LOTS NO. 8 AND 9, IN BLOCK NO.* 21. AS SHOWN ON THE PLAT OF MUTUAL LAND AND IMPROVEMENT COMPANY OF BALTIMORE CITY, WHICH SAID PLAT IS RECORDED ALONG WITH A DEED FROM THOMAS J. CANNON AND WIFE TO THE SAID* MUTUAL LAND AND IMPROVEMENT COMPANY OF BALTIMORE CITY, IN * LIBER W.I.P. 11, FOLIO 473, AMONG THE LAND RECORDS OF FREDERICK COUNTY, MARYLAND

Defendants

LAW OFFICE

LAWRENCE E. HEFFNER, JR.

3 NORTH COURT STREET

FREDERICK, MARYLAND 21701

(301) 695-2977

MOTION FOR SUMMARY JUDGMENT

*

Now comes Plaintiffs, Clayton J. Thomas and Gertrude V. Thomas, by their attorney, Lawrence E. Heffner, Jr., and state as